

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PECO PALLET, INC.,)	
)	Case No.: 15-cv-6811
Plaintiff,)	
)	Honorable Andrea R. Wood
v.)	
)	Magistrate Judge Michael T. Mason
NORTHWEST PALLET SUPPLY CO.,)	
)	
Defendant.)	

NORTHWEST PALLET SUPPLY CO.,)	
)	Case No.: 15-cv-50182
Plaintiff,)	
)	Honorable Andrea R. Wood
v.)	
)	Magistrate Judge Michael T. Mason
PECO PALLET, INC.,)	
)	
Defendant.)	

**NORTHWEST PALLET’S MOTION FOR EXTENSION
OF TIME TO COMPLETE ORAL FACT DISCOVERY**

Northwest Pallet Supply Co. (“Northwest Pallet”), through its counsel, Tarpey Wix LLC, respectfully requests an order extending the deadline for the parties to complete oral fact discovery and in support of its motion states the following:

1. The parties submitted a Joint Agreed Proposed Schedule on October 23, 2017, setting a deadline to complete oral fact discovery by December 22, 2017. Dkt. # 162. The Court adopted the order the following day. Dkt. # 163.
2. The parties have been working diligently and collaboratively to complete oral fact discovery. The parties have taken 2 party depositions thus far with 5 more party depositions scheduled for late November/early December. Nonetheless, despite making every effort to

complete depositions in accordance with the scheduling order, there are 2 additional party depositions and several third-party depositions that still need to be scheduled and it has quickly become clear that the parties will require additional time to complete fact these depositions due to difficulty coordinating the schedules of witnesses and attorneys on both sides due to the holidays and work commitments. In addition, the parties are still working through additional document productions by both sides that have delayed the scheduling of certain party depositions. Accordingly, Northwest Pallet requests an additional 30 days, until January 22, 2018, to complete oral fact discovery.

3. Northwest Pallet also requests the Court extend the remaining deadlines 30 days: deadline of expert disclosures on February 21, 2018; deadline for rebuttal expert disclosures on March 21, 2018; close of expert discovery on April 25, 2018; deadline for dispositive motions on May 16, 2018; deadline for responses to dispositive motions on June 13, 2018; deadline for replies in support of dispositive motions on July 2, 2018; trial in October 2018 or as soon thereafter as the Court's schedule permits.

4. This motion is made in good faith and not for purposes of delay. The extension requested herein will not prejudice any party.

WHEREFORE, for the foregoing reasons, Northwest Pallet Supply Co., respectfully requests that the Court grant the parties to and including January 22, 2018 to complete oral fact discovery and for any other relief this Court deems proper and just.

DATED: November 17, 2017

Respectfully submitted,

Northwest Pallet Supply Co.

/s/ David G. Wix

Tarpey Wix LLC

Attorneys for Plaintiff

Daniel W. Tarpey

David G. Wix

Matthew M. Showel

TARPEY WIX LLC

225 W. Wacker Drive, Suite 1515

Chicago, IL 60606

(312) 948-9090 Office

(312) 948-9105 Fax